

Mr. Kevin Bilash  
USEPA Region III  
Land, Chemicals & Redevelopment Division 3LD20  
1650 Arch Street  
Philadelphia, PA 19103

March 31, 2022  
File No. 4862.04

Re: Marcus Hook Industrial Complex  
Monthly Progress Report – March 2022  
Area of Interest 7  
Marcus Hook, PA

Dear Mr. Bilash:

This monthly progress report is being submitted on behalf of the Evergreen Resource Management Operations (Evergreen) for AOI 7 at the Marcus Hook Industrial Complex (MHIC) in Marcus Hook, Pennsylvania. On December 9, 2021, a Revised Interim Measures (IM) Workplan was submitted to the USEPA to address arsenic in the subsurface at AOI 7. The USEPA approved the Revised IM Workplan on February 15, 2022. This monthly progress report is being submitted in accordance with the USEPA's request in the October 26, 2021 correspondence concerning the IM Workplan.

**Activities completed this reporting period**

The activities that were completed during this reporting period (March 2022) include field mobilization, sediment/porewater sampling and stilling well installation, as described in the Revised IM Workplan, that occurred March 22, 2022 through March 25, 2022.

A summary of the sediment and porewater sampling event is described below:

- Sediment samples were collected for arsenic analysis (30 samples plus one field duplicate, MS and MSD sample) and sulfate/sulfide analysis (four samples).
- Porewater samples were collected via peristaltic pump, diffusive gradient thin film (DGT) samplers and through centrifuge samples for dissolved arsenic analysis.
  - 11 samples were collected via peristaltic pump (plus one field duplicate sample, the MS and MSD sample were not able to be collected due to available volume).
  - 21 samples were collected via DGT sampler.
  - 18 samples were collected via centrifuge sample (plus one field duplicate, MS and MSD sample).
- A 2-inch PVC stilling well was installed on Dock 3.

**Activities planned for the next reporting period**

The activities planned for the next reporting period (April 2022) include the following activities, as described in the Revised IM Workplan:

- Field mobilization
- Drilling and monitoring well installation (for one soil boring and four monitoring wells)
- Soil sampling (39 samples for arsenic and iron, 15 samples for COD/BOD/TOC, 9 samples for grain size, 2 samples for Atterberg limits, and 5 samples for bench scale treatability studies)
- Pressure transducer installation in 10 locations
- Groundwater flow meter installation in up to 10 locations

- Surveying of soil borings, monitoring wells, and stilling well

The proposed locations for the proposed boring and monitoring wells are shown in Figure 33 of the Revised IM Workplan, which is attached to this progress report as Figure 1. The field activities listed above are planned for April 4, 2022 through April 8, 2022.

In addition, groundwater sampling for the PDI and bench scale treatability studies, as described in the Revised IM Workplan, is planned for April 18, 2022 through April 19, 2022.

#### **Deviation from approved activities this reporting period**

The approved Revised IM Workplan included the collection of an additional sediment sample to be sent to the laboratory for centrifugation to extract porewater from sediment, if the peristaltic pump failed to yield results after two attempts at that location. As discussed with the USEPA on March 17, 2022, the sampling team was to make 2 attempts to collect porewater samples at each location. If a porewater sample could not be collected, the sampling team was to move onto the next location without collecting a centrifuge sample, since the proposed sample density was sufficient enough to allow for multiple locations to be eliminated and still provide sufficient data, unless a significant amount of porewater samples could not be collected.

Based on encountered field conditions, porewater samples could only be collected at 11 of the proposed 30 locations, despite up to 10 attempts at most locations to obtain a sample. These difficulties in sample collection were discussed with the USEPA during the field effort, and as discussed, the team returned to locations to collect additional samples for centrifuge analysis as well as additional DGT samples. The sampling team collected 18 samples to be analyzed via centrifuge analysis and 21 samples via DGT samplers, in addition to the 11 porewater samples.

As the sampling was just completed, a figure illustrating the sample locations and associated sampling methods will be included in the next Monthly Progress Report.

#### **Deviation from approved schedule**

The final schedule of IM Workplan activities was updated based on the February 15, 2022 USEPA approval and the availability of subcontractors to complete the planned activities. The schedule for the major milestones is provided below and the detailed schedule is included in Attachment A. There are no anticipated deviations from the approved schedule.

| <b>Task</b>                      | <b>Schedule</b>  |
|----------------------------------|------------------|
| PDI Activities                   | 3/2022 – 5/2022  |
| Bench Scale Treatability Testing | 4/2022 – 7/2022  |
| Pilot Testing                    | 7/2022 – 10/2022 |
| IM Performance Monitoring        | 9/2022 – 9/2023  |

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SANBORN, HEAD & ASSOCIATES, INC.



Colleen Costello, PG  
*Senior Vice President*

CSS/CC: css

## **FIGURES**

Figure 33 – Proposed Pre-Design Investigation Locations for Surface Water and Groundwater Measurements and Soil and Groundwater Data Collection for Bench Scale Treatability Testing

## **ATTACHMENTS**

Attachment A – Updated Interim Measures Implementation Schedule





Figure 1

**Proposed Pre-Design Investigation Locations for Surface Water and Groundwater Measurements and Soil and Groundwater Data Collection for Bench Scale Treatability Testing**

















Evergreen  
Marcus Hook, Pennsylvania

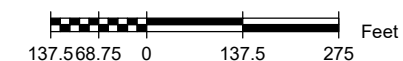
Drawn By: M. Fuerte / E. Wright  
Designed By: C. Costello  
Reviewed By: C. Costello  
Project No: 4862.00  
Date: December 2021

## Notes

1. AOI 7 well locations provided by Stanport data portal, August 2021.
2. Aerial imagery Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community.
3. SWMU 9 located based on SWMU 9 Data Summary Report, Wood, 2020.
4. The bulkhead, remedial systems, sheet pile wall and well locations were provided by Stantec in Figure I-3 "Phillips Island Remediation System Site Plan" from July 2019.

### Legend

-  Monitoring Well
-  Recovery Well
-  Remediation Well
-  Soil Boring
-  Staff Gauge
-  Proposed Monitoring Well
-  Proposed Soil Boring
-  Existing Location for PDI Sampling and Pressure Transducer
-  Existing Location for PDI Sampling
-  Current and historic arsenic in groundwater above 1,253 µg/L
-  Sunoco Pipeline
-  Bulkhead
-  Sheet Pile Wall
-  Remediation Systems
-  AOI-7 Boundary
-  SWMU 9 Boundary





ATTACHMENT A

Updated Interim Measures Implementation Schedule

AOI 7 MHIC

Marcus Hook, Pennsylvania

| Task Name  | Start    | Finish   | Q4  |     |             | Q1  |             |             | Q2          |             |             | Q3          |             |             | Q4          |             |             | Q1          |             |             | Q2          |             |             | Q3          |             |             | Q4          |             |     |
|--|----------|----------|-----|-----|-------------|-----|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-----|
|  |          |          | Oct | Nov | Dec         | Jan | Feb         | Mar         | Apr         | May         | Jun         | Jul         | Aug         | Sep         | Oct         | Nov         | Dec         | Jan         | Feb         | Mar         | Apr         | May         | Jun         | Jul         | Aug         | Sep         | Oct         | Nov         | Dec |
| Submit IM Workplan to EPA  | 12/09/21 | 12/09/21 |     |     | <div></div> |     |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |     |
| EPA Approval of IM Workplan  | 12/10/21 | 02/15/22 |     |     | <div></div> |     |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |     |
| <div>Monthly Report to EPA</div>   | 01/31/22 | 07/31/23 |     |     |             |     | <div></div> | <div></div> | <div></div> | <div></div> | <div></div> | <div></div> | <div></div> | <div></div> | <div></div> | <div></div> | <div></div> | <div></div> | <div></div> | <div></div> | <div></div> | <div></div> | <div></div> | <div></div> | <div></div> | <div></div> | <div></div> | <div></div> |     |
| January 2022 Monthly Report  | 01/31/22 | 01/31/22 |     |     |             |     | <div></div> |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |     |
| February 2022 Monthly Report   | 02/28/22 | 02/28/22 |     |     |             |     |             | <div></div> |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |     |
| March 2022 Monthly Report  | 03/31/22 | 03/31/22 |     |     |             |     |             |             | <div></div> |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |     |
| April 2022 Monthly Report  | 04/29/22 | 04/29/22 |     |     |             |     |             |             |             | <div></div> |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |     |
| May 2022 Monthly Report  | 05/31/22 | 05/31/22 |     |     |             |     |             |             |             |             | <div></div> |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |     |
| June 2022 Monthly Report   | 06/30/22 | 06/30/22 |     |     |             |     |             |             |             |             |             | <div></div> |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |     |
| July 2022 Monthly Report   | 07/29/22 | 07/29/22 |     |     |             |     |             |             |             |             |             |             | <div></div> |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |     |
| August 2022 Monthly Report   | 08/31/22 | 08/31/22 |     |     |             |     |             |             |             |             |             |             |             | <div></div> |             |             |             |             |             |             |             |             |             |             |             |             |             |             |     |
| September 2022 Monthly Report  | 09/30/22 | 09/30/22 |     |     |             |     |             |             |             |             |             |             |             |             | <div></div> |             |             |             |             |             |             |             |             |             |             |             |             |             |     |
| October 2022 Monthly Report  | 10/31/22 | 10/31/22 |     |     |             |     |             |             |             |             |             |             |             |             |             | <div></div> |             |             |             |             |             |             |             |             |             |             |             |             |     |
| November 2022 Monthly Report   | 11/30/22 | 11/30/22 |     |     |             |     |             |             |             |             |             |             |             |             |             |             | <div></div> |             |             |             |             |             |             |             |             |             |             |             |     |
| December 2022 Monthly Report   | 12/30/22 | 12/30/22 |     |     |             |     |             |             |             |             |             |             |             |             |             |             |             | <div></div> |             |             |             |             |             |             |             |             |             |             |     |
| January 2023 Monthly Report  | 01/31/23 | 01/31/23 |     |     |             |     |             |             |             |             |             |             |             |             |             |             |             |             | <div></div> |             |             |             |             |             |             |             |             |             |     |
| February 2023 Monthly Report   | 02/28/23 | 02/28/23 |     |     |             |     |             |             |             |             |             |             |             |             |             |             |             |             |             | <div></div> |             |             |             |             |             |             |             |             |     |
| March 2023 Monthly Report  | 03/31/23 | 03/31/23 |     |     |             |     |             |             |             |             |             |             |             |             |             |             |             |             |             |             | <div></div> |             |             |             |             |             |             |             |     |
| April 2023 Monthly Report  | 04/28/23 | 04/28/23 |     |     |             |     |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             | <div></div> |             |             |             |             |             |             |     |
| May 2023 Monthly Report  | 05/31/23 | 05/31/23 |     |     |             |     |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             | <div></div> |             |             |             |             |             |     |
| June 2023 Monthly Report   | 06/30/23 | 06/30/23 |     |     |             |     |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             | <div></div> |             |             |             |             |     |
| July 2023 Monthly Report   | 07/31/23 | 07/31/23 |     |     |             |     |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             | <div></div> |             |             |             |     |
| <div>PDI</div>   | 03/07/22 | 05/31/22 |     |     |             |     |             | <div></div> | <div></div> | <div></div> | <div></div> |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |     |
| PDI Mobilization   | 03/22/22 | 05/31/22 |     |     |             |     |             | <div></div> | <div></div> | <div></div> | <div></div> |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |     |
| <div>Sediment and Porewater Sampling</div>                               | 03/22/22 | 05/31/22 |     |     |             |     |             | <div></div> | <div></div> | <div></div> | <div></div> |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |     |
| Field Mobilization   | 03/22/22 | 03/22/22 |     |     |             |     |             | <div></div> |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |     |
| Collection of sediment samples and grab porewater samples                | 03/22/22 | 03/25/22 |     |     |             |     |             | <div></div> |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |     |
| Collection of DGT porewater samples                                      | 03/22/22 | 03/23/22 |     |     |             |     |             | <div></div> |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |     |
| Laboratory Data Analysis   | 03/28/22 | 04/11/22 |     |     |             |     |             | <div></div> | <div></div> |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |     |
| Data Validation  | 04/11/22 | 04/25/22 |     |     |             |     |             |             | <div></div> | <div></div> |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |     |
| Data Evaluation  | 04/25/22 | 05/31/22 |     |     |             |     |             |             |             | <div></div> | <div></div> |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |     |
| <div>GW Elevation and GW Flow Evaluation</div>                           | 04/07/22 | 04/29/22 |     |     |             |     |             | <div></div> | <div></div> | <div></div> |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |     |
| Installation of Transducers/Flow Meter                                   | 04/08/22 | 04/08/22 |     |     |             |     |             | <div></div> |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |     |
| Install stilling well  | 04/07/22 | 04/08/22 |     |     |             |     |             | <div></div> |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |     |
| Data Collection  | 04/08/22 | 04/27/22 |     |     |             |     |             | <div></div> | <div></div> |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |     |
| Data Evaluation  | 04/27/22 | 04/29/22 |     |     |             |     |             |             | <div></div> |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |     |
| <div>Monitoring Well Installations, Soil Borings and Soil Sampling</div> | 03/07/22 | 05/31/22 |     |     |             |     |             | <div></div> | <div></div> | <div></div> | <div></div> |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |     |
| Obtain Access to Honeywell Property                                      | 03/07/22 | 04/01/22 |     |     |             |     |             | <div></div> | <div></div> |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |     |
| Delaware Well Permits  | 03/21/22 | 04/01/22 |     |     |             |     |             | <div></div> |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |     |
| Utility Clearance  | 03/25/22 | 03/25/22 |     |     |             |     |             | <div></div> |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |     |
| Soil Borings, Well Installations and Soil Sampling                       | 04/04/22 | 04/08/22 |     |     |             |     |             | <div></div> |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |     |

| Task Name   | Start    | Finish   | Q4  |     |     | Q1  |     |     | Q2  |     |     | Q3  |     |     | Q4  |     |     | Q1  |     |     | Q2  |     |     | Q3  |     |     | Q4  |     |     |
|---|----------|----------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
|   |          |          | Oct | Nov | Dec | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec |
| Laboratory Data Analysis                                      | 04/11/22 | 04/25/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| Data Validation   | 04/25/22 | 05/06/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| Well Development  | 04/07/22 | 04/08/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| Well and Boring Survey  | 04/18/22 | 04/18/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| Data Evaluation   | 05/06/22 | 05/31/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| <div><div></div></div> Groundwater Sampling                   | 04/18/22 | 05/31/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| Groundwater Sampling  | 04/18/22 | 04/19/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| Laboratory Data Analysis                                      | 04/19/22 | 05/03/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| Data Validation   | 05/03/22 | 05/16/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| Data Evaluation   | 05/16/22 | 05/31/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| <div><div></div></div> Bench Scale Treatability Test          | 04/19/22 | 07/22/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| Baseline Characterization                                     | 04/19/22 | 05/02/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| <div><div></div></div> Titration and Soil Oxidant Demand Test | 05/02/22 | 05/06/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| Titration   | 05/02/22 | 05/02/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| Soil Oxidant Demand Test                                      | 05/02/22 | 05/06/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| <div><div></div></div> Reagent Screening                      | 05/09/22 | 06/03/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| Test Setup  | 05/09/22 | 05/10/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| Initial Test  | 05/11/22 | 05/13/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| Modification Test (If Needed)                                 | 05/16/22 | 05/27/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| Evaluation  | 05/30/22 | 06/03/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| <div><div></div></div> Rebound Test                           | 06/06/22 | 07/08/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| Reactor Setup   | 06/06/22 | 06/06/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| First Sampling and Replenishing                               | 06/13/22 | 06/13/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| Second Sampling and Replenishing                              | 06/20/22 | 06/20/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| Final Sampling  | 06/27/22 | 06/27/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| Evaluation  | 06/27/22 | 07/08/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| Bench-scale Study Report                                      | 07/11/22 | 07/22/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| <div><div></div></div> Pilot Test                             | 07/25/22 | 08/30/23 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| Pilot Study Design  | 07/25/22 | 08/15/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| <div><div></div></div> Pilot Study Implementation             | 08/16/22 | 10/10/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| Permit  | 08/16/22 | 09/05/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| Injection Preparation   | 09/06/22 | 09/19/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| Injection Activities  | 09/20/22 | 10/10/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| <div><div></div></div> Pilot Study Monitoring                 | 09/20/22 | 08/30/23 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| Baseline Sampling   | 09/20/22 | 09/22/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| First Performance Monitoring                                  | 11/28/22 | 11/30/22 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| Second Performance Monitoring                                 | 02/28/23 | 03/02/23 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| Third Performance Monitoring                                  | 05/29/23 | 05/31/23 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| Fourth Performance Monitoring                                 | 08/28/23 | 08/30/23 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| <div><div></div></div> CMS                                    | 09/04/23 | 10/09/23 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| Design of Final Remedy  | 09/04/23 | 10/06/23 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| Submittal of CMS  | 10/09/23 | 10/09/23 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |